

RQ-2

Harvey Hurdle, Treasurer Human Rights Campaign PAC 1640 Rhode Island Avenue NW Washington, DC 20036

Response Due Date: November 15, 2004

Identification Number: C00235853

Reference:

August Monthly Report (7/1/04-7/31/04)

Dear Mr. Hurdle:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Line 21(a) of the Detailed Summary Page discloses allocated federal/non-federal operating expenditures during the reporting period. Committees must itemize each allocated disbursement made from its federal account or separate allocation account <u>regardless of the amount</u>. Please amend your report(s) by itemizing the expenditures on Schedule H4. 11 CFR §§104.10 and 104.17

Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): Communication Expenses. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

Please clarify all expenditures made for "Communication Expenses" on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend Schedule E by providing the State of the Primary election for each independent expenditure. 11 CFR \$104.3(b)(3)(vii) Please be advised that the Commission determined in Advisory Opinion 2003-40 that each State's Presidential primary is considered a separate election for purposes of aggregating independent expenditures

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toil-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1141.

Sincerely,

Kristine Adams

Campaign Finance Analyst Reports Analysis Division